

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

HILDA L. SOLIS, Secretary of Labor)	
United States Department of Labor,)	
)	
Plaintiff,)	No. 10 C 4467
)	
v.)	Judge Dow
)	
DISTRICT LODGE NO. 141, INTERNATIONAL)	
ASSOCIATION OF MACHINISTS AND)	
AEROSPACE WORKERS, AFL-CIO,)	
)	
Defendant.)	

STIPULATION OF SETTLEMENT AND ORDER

Plaintiff, Hilda L. Solis, Secretary of Labor, United States Department of Labor (the Secretary or Plaintiff), having filed her complaint and Defendant, District Lodge, No. 141, International Association of Machinists and Aerospace Workers, AFL-CIO, (District Lodge 141 or Defendant), having appeared by counsel and answered and denied the allegations in the Secretary's complaint, and in order to resolve this action without the necessity of further litigation, the parties, by and through their undersigned counsel, hereby stipulate and agree to settlement of this dispute as follows:

1. The Secretary brought this action under Title IV of the Labor-Management Reporting and Disclosure Act of 1959 (as amended), 29 U.S.C. §§401 et seq. (Act or LMRDA), seeking an order declaring void the 2010 election for the office of Assistant General Chairperson and further seeking an order directing District Lodge 141 to conduct new nominations and a new election for this office under the supervision of the Secretary.

2. The parties, in settlement of this action, stipulate and agree that the Secretary will supervise District Lodge 141's next regularly scheduled election for all offices, including nominations, scheduled for June 2012. The regularly scheduled election shall include the positions of President/Directing General Chairman, Secretary-Treasurer, Vice President East, Vice President Hawaiian Area, one Vice President At-Large, two Trustees, and 11 Assistant General Chairpersons. The term of office for these positions is four years.

3. The parties further stipulate and agree that in conjunction with the June 2012 supervised election of the above offices, the Secretary will also supervise the conduct of a new election for the 10 Assistant General Chairperson positions that were subject to election in the June 2010 contested election. The supervised election will include nomination and election of the 10 Assistant General Chairpersons who will serve for the remainder of the term that commenced at the District Lodge 141 Convention held in 2010.

4. The parties stipulate and agree that should District Lodge 141's membership fluctuate such that the number of Assistant General Chairperson positions increases or decreases as dictated by Article 8, Section 1(a) and Article 10, Section 1(d) of the District Lodge 141 Bylaws, the supervised election will reflect the accurate number of Assistant General Chairperson positions to be elected. Further, to be consistent with the District Lodge 141 practice of staggering its elections so not all offices are to be elected at the same time, the number of Assistant General Chairperson positions shall be divided as equally as possible between the two and four year terms of office.

5. The parties stipulate and agree that the election shall be conducted in accordance with Title IV of the LMRDA (29 U.S.C. § 481 et seq.) and, insofar as lawful and practicable, in

accordance with the International Association of Machinists and Aerospace Workers Constitution (IAM) and District Lodge 141's Bylaws.

6. All decisions as to the interpretation or application of Title IV of the LMRDA, the IAM Constitution and District Lodge 141's Bylaws relating to the supervised election are to be determined by the Secretary, and her decision shall be final, subject to review by this Court.

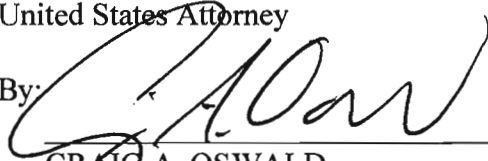
7. The Court shall retain jurisdiction of this action and, after completion of the supervised election, the Secretary shall certify to the Court the name of persons so elected, and that such election was conducted in accordance with Title IV of the LMRDA, and insofar as lawful and practicable, in accordance with the provisions of the IAM Constitution and District Lodge 141's Bylaws. Upon approval of such certification, the Court shall enter a Judgment declaring that such persons have been elected as shown by such certification.

8. Each party shall bear its own fees including attorney fees, costs, and other expenses incurred by such party in connection with any stage of this proceeding.

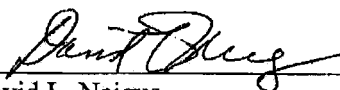
Respectfully submitted,

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By:



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